

**IN THE UNITED STATES DISTRICT COURT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

IN RE: AQUEOUS FILM-FORMING  
FOAMS PRODUCTS LIABILITY  
LITIGATION

MDL No. 2:18-mn-2873-RMG

This Document Relates to:

*The Commonwealth of Puerto Rico v. 3M  
Company, et al.*, Case No.: 2:23-cv-02351-  
RMG

**MOTION FOR LEAVE TO AMEND COMPLAINT TO ADD ADDITIONAL  
PLAINTIFFS**

**PLEASE TAKE NOTICE**, that upon the Memorandum of Law in Support of the Commonwealth's Motion for Leave to Amend the Complaint, the Declaration of Jimmy R. Rock, and the exhibits annexed thereto, Plaintiff, the Commonwealth of Puerto Rico (the "Commonwealth") moves this Court for an order pursuant to Rule 15 of the Federal Rules of Civil Procedure granting the Commonwealth leave to amend its Complaint in this action to add additional instrumentalities of the Commonwealth as plaintiffs.

**PLEASE TAKE FURTHER NOTICE**, that pursuant to Local Rule 7.06, opposing affidavits and memoranda of law, if any, must be filed within fourteen days of the filing of this motion, unless the parties agree otherwise, or the Court imposes a different schedule.

Date: July 31, 2023

Respectfully submitted,

**DOMINGO EMANUELLI HERNÁNDEZ  
SECRETARY OF JUSTICE  
DEPARTMENT OF JUSTICE OF PUERTO  
RICO**

By: /s/ Guarionex Díaz Martínez

**GUARIONEX DÍAZ MARTÍNEZ**

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**EDELSON PC**

*By:/s/ Jimmy Rock*

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*By:/s/ Robert S. Libman*

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**MIRAMAR GROUP LLC**

*By:/s/ Carlos J. Sagardía-Abreu*

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